REMARKS

Claims 1-10 are pending in this application. By this Amendment, Figs. 1 and 2a are amended. No new matter is added.

The Office Action objects to the drawings. Figs. 1 and 2a are amended, as the Examiner requested. Accordingly, withdrawal of the objection to the drawings is respectfully requested.

The Office Action rejects claims 1-8 and 10¹ under 35 U.S.C. §103(a) over U.S. Patent No. 6,236,380 to Wani et al. in view of U.S. Patent No. 5,867,140 to Rader. This rejection is respectfully traversed.

The Office Action admits that Wani does not disclose or suggest the certain scanning lines corresponding to display elements included in a certain part of a region for displaying gray level, and the other scanning lines responding to display elements included in the other part of the region for not displaying the gray level, as recited in claim 1. However, the Office Action asserts that Rader discloses these features. Applicant respectfully submits that one of ordinary skill in the art would not have been motivated to combine Wani and Rader.

Wani discloses a method for displaying gradation in which a sustaining period of a subfield contains lower bits and upper bits. See Fig. 1, and col. 3, lines 10-39. Wani discloses addressing the lower bits by interlace scanning (the partial scanning subfield), and addressing the upper bits by non-interlace scanning (the whole scanning subfield). See col. 3, lines 31-39. Wani discloses that, when interlace scanning is performed, half of the scanning electrodes are selected and the addressing period is shortened. See col. 3, lines 23-25. Wani requires applying a negative voltage to all scanning electrodes, from the first to the 500th

¹ The Office Action lists claims 1-4, 7, 9 and 10 in this rejection. However, it is understood that the Office Action intended claims 1-8 and 10 in this rejection.

scanning electrode before sustaining discharges. See col. 4, lines 12-17, and col. 4, line 64 - col. 5, line 3.

On the other hand, Rader discloses a cellular phone with a full display screen area 303 to display an entire image. See Fig. 3, col. 2, lines 21-30. Rader discloses that the cellular phone has a second operation mode in which only part of the image is displayed in the partial display field 305. See Fig. 3, and col. 2, lines 21-30.

One of ordinary skill in the art would not have been motivated to combine Wani and Rader. Combining Rader with Wani would have required a partial display of an image, which would have prevented the negative voltage from being applied to <u>all</u> scanning electrodes, thus, preventing Wani from sustaining discharges. Thus, such a combination would have rendered Wani inoperable.

The Office Action appears to engage in impermissible hind-sight reconstruction by using the present application as a road map to pick and choose features out of the prior art, because one of ordinary skill in the art would not have been motivated to combine Radar with Wani to render Wani inoperable. Thus, the Office Action has failed to bear its burden to establish a *prima facie* case of obviousness, because it has failed to show any motivation for combining Wani and Rader.

Furthermore, Applicant respectfully submits that Wani and Rader, either individually or in combination, do not disclose or suggest supplying scanning signals to the other scanning lines corresponding to the display elements included in the other part of the region for not displaying the gray level, as recited in claims 1-10.

As discussed above, Wani discloses interlace and non-interlace scanning for lower and upper bit subfield. Wani does not disclose or suggest a region <u>for not displaying</u> the gray level. Therefore, Wani does not disclose or suggest supplying a scanning signal to the other

scanning lines corresponding to display elements included in the other part of the region for not displaying the gray level, as recited in claims 1-10.

Rader discloses, as discussed above, a full image display mode and a partial image display mode. As is known in the art, in the partial image display mode, no scanning signal is applied to the scanning lines corresponding to the part of the image that is not displayed. Therefore, Rader does not disclose or suggest supplying scanning signal to the other scanning lines corresponding to display elements included in the other part of the region for not displaying gray level, as recited in claims 1-10. Thus, Rader does not supply the subject matter lacking in Wani. Accordingly, Wani and Rader, either individually or in combination, do not disclose or suggest the subject matter recited in claims 1-10.

For at least the above reasons, withdrawal of the rejection of claims 1-8 and 10 under 35 U.S.C. §103(a) is respectfully requested.

The Office Action rejects claim 9 under 35 U.S.C. §103(a) over Wani and in Rader in view of U.S. Patent No. 5,805,121 to Burgan et al. This rejection is respectfully traversed.

As discussed above, one of ordinary skill in the art would not have been motivated to combine Wani and Rader. Therefore, one of ordinary skill in the art would not have been motivated to further combine Burgan with the combination of Wani and Rader. Thus, the Office Action fails to establish a *prima facie* case of obviousness, because it has failed to show any motivation for combining Wani, Rader and Burgan.

Furthermore, Applicant respectfully submits that Wani, Rader and Burgan, either individually or in combination, do not disclose or suggest the subject matter recited in claim 1.

Burgan discloses a method for improving power consumption in a stand-by mode for pixels in an LCD. See col. 1, lines 30-40. Burgan is not directed to a part of the region for not displaying gray levels. Therefore, Burgan does not disclose or suggest supplying

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scanning signal to the other scanning lines corresponding to display elements included in the other part of the region for not displaying gray level, as recited in claim 1. Thus, Burgan does not supply the subject matter discussed above, in connection with the rejection of claims 1-8 and 10, as lacking in Wani and Rader. Accordingly, Wani, Rader and Burgan, either individually or in combination, do not disclose or suggest the subject matter recited in claim 1, and claim 9 depending therefrom.

For at least the above reasons, withdrawal of the rejection of claim 9 under 35 U.S.C. §103(a) is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-10 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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JAO:GXL/sqb Attachment:

Replacement Sheets

Date: June 29, 2004

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